



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SPN/PTH/KTF/VAZ
F. #2015R00747

*271 Cadman Plaza East
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By E-mail

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Re: United States v. Full Play Group SA, et al.
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Counsel:

The government writes to inform you of an upcoming production of materials consisting of emails and electronic documents from two hard drives from, respectively, the work computers of Alejandro Burzaco and his former assistant at Torneos.

The hard drives were among materials Mr. Burzaco's sister retrieved from Mr. Burzaco's office when she went to Torneos, at his direction, to collect and preserve his belongings following the unsealing of the government's indictment in May 2015. It is the government's understanding that emails accessed through the work computers would have been backed up on the Torneos servers, the relevant contents of which have already been produced. In light of defense counsel's focus in this case on devices held by Mr. Burzaco, however, the government, in an abundance of caution, requested that counsel for Mr. Burzaco arrange to have the drives transported to the United States. Other materials collected by Mr. Burzaco's sister, including credit card statements and calendars, were obtained previously and have been produced to you.

Once the government is in receipt of non-privileged materials from the drives – a privilege review is under way – we will promptly produce any relevant materials pursuant to Rule 16, Brady, and/or Giglio, as applicable.

Very truly yours,

BREON S. PEACE
United States Attorney

By: /s/
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cc: Clerk of Court